



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

5 Post Office Square, Suite 100
Boston, MA 02109-3912

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAY 02 2011

Carey Paster, President
First Student, Inc.
600 Vine St., Suite 1400
Cincinnati, OH 45202

Re: Clean Air Act Reporting Requirement

Dear Mr. Paster:

The United States Environmental Protection Agency ("EPA") is issuing the enclosed Reporting Requirement to First Student, Inc. ("First Student") in order to evaluate First Student's compliance with the federal Clean Air Act ("the Act"), 42 U.S.C. § 7401 *et. seq.*, and its implementing regulations. These legal requirements include, but are not limited to federally-enforceable motor vehicle idling limits contained in the Connecticut state implementation plan ("SIP") at Regulations of Connecticut State Agencies ("RCSA") § 19-508-18(a)(5), in the Massachusetts SIP at 310 CMR § 7.11(1)(b), and in the Rhode Island SIP at Air Pollution Control Regulation ("APCR") 45.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether a facility is in compliance with the Clean Air Act and its implementing regulations.

Therefore beginning June 1, 2011 and continuing through May 31, 2012, EPA is requiring First Student to gather the following information about its school bus lots and school bus operations in Connecticut, Massachusetts, and Rhode Island. Provide responses in an electronic spreadsheet format.

1. Provide the name and address of all school bus lots located in Connecticut, Massachusetts, and Rhode Island.
2. For each lot, indicate the dates and times each month that a supervisor has performed an on-site walk through of the lot to check for excessive idling (i.e., idling in excess of the limits contained in the Connecticut, Massachusetts, and Rhode Island anti-idling regulations).

3. In the event that a supervisor observes excessive idling, indicate:
 - a. The estimated duration (in minutes) of the idling;
 - b. The reason for the idling;
 - c. Steps taken by the supervisor to address the idling; and
 - d. Any additional steps taken to address the idling.
4. Report this information to EPA once every three months by: September 15, 2011; December 15, 2011; March 15, 2012; and June, 15, 2012.

This Reporting Requirement is not subject to Office of Management and Budget review under the Paperwork Reduction Act, and applies to First Student and its partners, officers, employees, agents, successors and assigns.

First Student may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R § 2.203(b). Information subject to such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. Note that certain categories of information, such as emissions data, are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to First Student. Please be aware that states may have different rules and regulations governing the protection of confidential business information.

Submit the above-required electronic response to:

Abdi Mohamoud - mohamoud.abdi@epa.gov

and to:

Tim Conway - conway.tim@epa.gov

If you have any questions regarding this letter, please contact Abdi Mohamoud, at (617) 918-1858, or have your attorney call Tim Conway, Senior Enforcement Counsel, at (617) 918-1705.

Sincerely,

Sam Silverman, acting for

Susan Studlien, Director
Office of Environmental Stewardship

cc: Bob Girard, CT DEP
Ted Burns, RI DEM
Nancy Seidman, MassDEP
Stephen J. Humes, Esq.